

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 5:18-cr-00182-8
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR
)	
vs.)	
)	
GILBERT TREVISIO-GARCIA,)	<u>MOTION TO EXTEND CHANGE OF</u>
)	<u>PLEA DEADLINE UNTIL JULY 29,</u>
Defendant.)	<u>2019</u>
)	

Now comes the Defendant, Gilbert Treviso-Garcia, by and through undersigned counsel, and hereby respectfully requests this Honorable Court to extend the change of plea deadline from July 15, 2019 to July 29, 2019. Counsel entered appearance in this case on June 14, 2019 and has been actively reviewing the discovery material, had meetings with the Defendant, and engaged in meaningful plea negotiations with the government. This Honorable Court's June 10, 2019 Order states that the Final Pretrial Conference/Plea cut-off is scheduled for July 15, 2019 at 11:30 AM and the Jury Trial is scheduled for August 26, 2019 at 09:00 AM. On July 9, 2019, counsel for Defendant Sohrabi also requested an extension of the Defendant's plea deadline. (R. 102, PAGE ID 813-814).

This request for continuance is made in good faith and for the purpose of promoting the ends of justice. Counsel has discussed this matter with counsel for the government who has indicated that they have no objection to the granting of this request. Based upon the

foregoing, the Mr. Treviso-Garcia respectfully request this Honorable Court to extend the change of plea deadline until July 29, 2019.

Respectfully submitted,

/s/Marisa L. Serrat

Marisa L. Serrat (#0088840)

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Respectfully submitted,

/s/Marisa L. Serrat

Marisa L. Serrat (#0088840)

Attorney for the Defendant